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Subject: Comanche BAP Conversion EPA update
Date: Wednesday, January 13, 2021 5:27:04 PM

Treasure/All – We thought it timely to provide EPA with a brief update on our progress to construct the alternate CCR capacity (bottom ash slurry treatment system) to meet the CCR Rule deadline to cease using and initiate closure of the Comanche bottom ash pond by the April deadline.

On October 23, 2020 we submitted to the Colorado Water Quality Control Division an application to modify the Comanche discharge permit. Xcel staff have maintained communication with Division staff as they have been conducting their review, responding to Division questions and providing follow up information. The Division has confirmed that they intend to publish the public notice on the draft permit on Thursday January 14, 2021 for a 30-day public review period. The number and complexity of comments received will determine how long the Division will need to review and issue the proposed final permit, but the Division is aware of our need for expedited review in order to meet the CCR Rule deadline. In order for the discharge permit to have an April 2021 effective date, the Division will need to publish the final proposed permit March 2, 2021, to allow for the required final 30-day public review and appeal period. Xcel staff will review the draft permit early in the initial public notice period and provide any comments we may have and will maintain communication with the Division throughout the process to quickly resolve any questions that may arise.

Xcel issued RFPs for the new treatment system on December 18th with bids due January 12th. We are currently expediting our review of the bids, with the intent of selecting a vendor and completing contracting in early February, followed by initiation of site preparation and system installation. We are also pursuing in parallel, a more flexible temporary system that could be deployed more quickly if necessary to meet the April deadline. We are coordinating system tie-in with planned spring maintenance outages for Units 1 & 2. We have also initiated work to re-route non-CCR discharges and are on track to cease discharging the non-CCR waste stream to the bottom ash pond by January 31st, as reflected in the project schedule we provided previously to EPA.

Please let us know if you have any questions on this update.

Regards,

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